

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA**

ELIZABETH SINES	:	Case No. 3:17-cv-00072
Plaintiff	:	Judge MOON
		Mag. Judge Hoppe
	:	
-v-		
JASON KESSLER et al.	:	
	:	
Defendants		

RESPONSE IN OPPOSITION TO MOTION FOR DIRECT ACCESS

To move this discovery process along, however marginally, Mr. Kessler requests the Court not grant the plaintiffs' motion without the following modifications.

1. That Mr. Kessler be given 24 hours to review his data and authorize production from the time the third-party vendor makes the data available for review;
2. That any data directly accessed be deemed "highly confidential" pursuant to the confidentiality agreement governing this case;
3. That plaintiffs be prohibited from using any privileged information they directly access for any reason without further order of this Court.

Defendant reserves the right to object to any decision that does not substantially include the three requests listed herein.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify the above was served on February 24, 2020 on all ECF participants and that parties requiring service by other means were served as follows:

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s/ James E. Kolenich
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